

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BAYU SAPUTRA, Personal Representative of  
the Heirs of CANDRA KIRANA, deceased, et  
al.,

Plaintiffs,

v.

THE BOEING COMPANY, a corporation,

Defendant.

In re: Lion Air JT 610 Crash

Lead Case No. 18-cv-07686

Hon. Thomas M. Durkin

This document relates to:

Case No. 18-cv-07686

**PLAINTIFFS' UNCONTESTED MOTION FOR LEAVE TO FILE A SECOND  
AMENDED COMPLAINT**

Plaintiffs, through undersigned counsel, pursuant to Federal Rule of Civil Procedure 15(a)(2), move this Court for leave to file a second amended complaint and in support thereof state as follows:

1. Plaintiffs are the personal representatives of the heirs of persons who perished in the crash of Lion Air Flight 610 on October 29, 2018.

2. On October 29, 2018, a Boeing 737 Max 8 aircraft was being operated by Lion Air as Flight No. JT 610 from Jakarta, Indonesia to Pangkal Pinang, Indonesia. Shortly after take-off, a sensor on the aircraft sent an erroneous reading causing the Maneuvering Characteristics Augmentation System (MCAS) to aircraft to pitch downward repeatedly despite efforts by the pilots to regain control. Ultimately, the aircraft crashed into the Java Sea, killing all those onboard, including plaintiffs' decedents.

3. On November 19, 2018, plaintiffs filed the instant action seeking wrongful death and survival damages against defendant The Boeing Company for its liability premised upon negligence and strict product liability theories.

4. During the pendency of this action, multiple plaintiffs' claims were settled and were dismissed with prejudice by this Court.

5. Plaintiffs seek to file a second amended complaint striking from the complaint those plaintiffs whose claims have been dismissed with prejudice pursuant to settlement by this Court. Additionally, plaintiffs seek to file an amended complaint adding as plaintiffs additional personal representatives of the heirs of other persons who perished in the Lion Air Flight 610 crash. (Exhibit A – Proposed Second Amended Complaint)

6. This is plaintiff's second request for leave to file an amended complaint.

7. Defendant will not be prejudiced by the relief that plaintiffs seek herein as defendant is already on notice of the potential claims against it and the statute of limitations has not yet expired. Defendant certainly will not be prejudiced by the removal of plaintiffs whose claims have settled and have been dismissed with prejudice from the complaint at all.

8. In accordance with the Court's standing orders, plaintiffs' counsel conferred with counsel for defendant who indicated that defendant has no objection to plaintiffs' motion for leave to file the proposed amended complaint.

WHEREFORE, plaintiffs, through undersigned counsel, pursuant to Federal Rule of Civil Procedure 15(a)(2), respectfully request that this Court enter an Order granting plaintiffs leave to file a second amended complaint and providing any other such relief that this Court deems just.

Dated: March 30, 2020

Respectfully submitted,

/s/Alexandra M. Wisner

Attorney For Plaintiffs

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**CERTIFICATE OF SERVICE**

Alexandra M. Wisner, an attorney, certifies that she served Plaintiffs' Uncontested Motion For Leave To File A Second Amended Complaint upon all counsel of record via CM/ECF on March 30, 2020.

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/s/Alexandra M. Wisner